EPA Region 5 Records Ctr.

374503

SQUIRE COUNSEL WORLDWIDE

SQUIRE, SANDERS & DEMPSEY L.L.P.

4900 Key Tower 127 Public Square Cleveland, Ohio 44114-1304

Office:

+1.216.479.8500

Fax

+1.216.479.8780

Direct Dial:

+1.216.479.8332

10 April 2003

Via Electronic Mail

Ms. Gwendolyn Massenburg, Remedial Project Manager U.S. EPA, Region V (SR-6J) 77 West Jackson Blvd. Chicago, IL 60604-3590

Re:

March 2003 Monthly Progress Report

PRP-Conducted Remedial Investigation and Feasibility Study at Chemical

Recovery Systems Inc., Elyria, Ohio CERCLIS ID # OHD 057 001 810

Dear Ms. Massenburg:

Attached is the Monthly Progress Report for March 2003. The report is submitted by electronic mail in accordance with Tom Nash's July 3, 2002 e-mail approving the electronic transmission of this and future Monthly Progress Reports.

If you have any questions concerning the report, please call me at (216) 479-8332.

Sincerely,

Douglas A. McWilliams

Douglas A. Mc Williams Chairperson, CRS Site Group

Attachment

cc:

Thomas Nash, Associate Regional Counsel, U.S. EPA Lawrence Antonelli, Ohio EPA

CRS Site Group

CINCINNATI - CLEVELAND - COLUMBUS - FOUSTON - JACKSONVILLE - LOS ANGELES - MIAMI - NEW YORK - PALO ALTO - PHOENIX - SAN FRANCISCO TAMPA - TYSONS CORNER - WASHINGTON DC | BRIVTSLAVA - BRUSSELS - BUDAPEST - KYIV - LONDON - MADRID - MILAN - MOSCOW PRAGUE | ALMATY - BEIJING - FRONG KONG - TAIPET - TOKYO | ASSOCIATED OFFICES: BUCHAREST - DUBLIN - RIO DE JANEIRO - SÃO PAULO

CHEMICAL RECOVERY SYSTEMS (CRS) SITE GROUP RI/FS PROGRESS REPORT NO. 10

Reporting Period: March 2003

ACTIONS TAKEN IN MARCH 2003 TO COMPLY WITH CONSENT ORDER

- Submitted Monthly Progress Report as required by AOC ¶ 82.
- Received approval to extend the delivery date for the Field Sampling Plan and the RI/FS Work Plan revisions from 12 March 2003 to 4 April 2003.
- Revised per U.S. EPA comments, the RI/FS Work Plan and Field Sampling Plan to be resubmitted by 4 April 2003.

SUMMARY OF ALL VALIDATED RESULTS OF SAMPLING AND TESTS AND ALL OTHER DATA RECEIVED OR GENERATED IN REPORTING PERIOD

- No sampling or testing was conducted during reporting period.
- No data was generated or received during reporting period.

WORK PLANS AND OTHER DELIVERABLES REQUIRED, COMPLETED, AND SUBMITTED IN REPORTING PERIOD

- Revised per U.S. EPA comments and submitted the Quality Assurance Project Plan (QAPP), Revision II, on 28 February 2003 for delivery on 3 March 2003.
- Monthly Progress Report submitted as required by AOC ¶ 82.

WORK PLANNED FOR THE NEXT TWO MONTHS AND SCHEDULES

- Revise page to the Parsons Quality Management Plan listing a reference to the Region 5 Instructions on the Preparation of a Superfund Division Quality Assurance Project Plan (June 2000).
- Revise RI/FS Work Plan and Field Sampling Plan by 4 April 2003 in accordance with the requirements of AOC ¶ 64 and the extension granted.
- Revise pages to Revision II of the QAPP to agree with the changes made to the RI/FS Work Plan and Field Sampling Plan and revised Tables in the format referenced in Region 5 Instructions on the Preparation of a Superfund Division Quality Assurance Project Plan (June 2000).
- Submit Monthly Progress Reports in accordance with AOC ¶ 82.

PERCENTAGE OF WORK COMPLETE, DELAYS ENCOUNTERED OR ANTICIPATED, DESCRIPTION OF EFFORTS MADE TO MITIGATE THOSE DELAYS

• U.S. EPA review of the RI/FS Work Plan documents and the contractor qualifications has taken longer than anticipated in our Work Plan schedule. To mitigate these delays, we

responded diligently and completely to the issues identified during U.S. EPA's review by timely submitting revised documents.

WORK PLAN OR SCHEDULE MODIFICATIONS

• The estimated date for completing review of the RI/FS Work Plan and related documents on the schedule submitted with the Work Plan (11 October 2002) needs to be adjusted when the review is completed. Some of the subsequent milestones may also need to be changed. We will revise the schedule accordingly when we submit the final signed version of the RI/FS Work Plan.

COMMUNITY RELATIONS SUPPORT

• USEPA's Community Relations Coordinator, Zenny Sadlon, provided the Group with a verbal summary of the 21 March 2003 public availability sessions in Elyria. The Group will receive a copy of any final written report of the event from Mr. Sadlon.



SQUIRE, SANDERS & DEMPSEY L.L.P.

4900 Key Tower 127 Public Square Cleveland, Ohio 44114-1304

+1.216.479.8500

+1.216.479.8780

Direct Dial: +1.216.479.8332

10 May 2003

Via Electronic Mail

Ms. Gwendolyn Massenburg, Remedial Project Manager U.S. EPA, Region V (SR-6J) 77 West Jackson Blvd. Chicago, IL 60604-3590

Re:

April 2003 Monthly Progress Report

PRP-Conducted Remedial Investigation and Feasibility Study at Chemical

Recovery Systems Inc., Elyria, Ohio CERCLIS ID # OHD 057 001 810

Dear Ms. Massenburg:

Attached is the Monthly Progress Report for April 2003. The report is submitted by electronic mail in accordance with Tom Nash's July 3, 2002 e-mail approving the electronic transmission of this and future Monthly Progress Reports.

If you have any questions concerning the report, please call me at (216) 479-8332.

Sincerely,

Douglas A. McWilliams

Douglas A. Mc Williams Chairperson, CRS Site Group

Attachment

cc:

Thomas Nash, Associate Regional Counsel, U.S. EPA Lawrence Antonelli, Ohio EPA **CRS Site Group**

CHEMICAL RECOVERY SYSTEMS (CRS) SITE GROUP RI/FS PROGRESS REPORT NO. 11

Reporting Period: April 2003

ACTIONS TAKEN IN APRIL 2003 TO COMPLY WITH CONSENT ORDER

- Submitted Monthly Progress Report as required by AOC ¶ 82.
- Submitted the Field Sampling Plan and the RI/FS Work Plan revisions for delivery on 4 April 2003.
- Revised pages for the Parsons Quality Management Plan were resubmitted for delivery on 4 April 2003 based on discussions with U.S. EPA. U.S. EPA affirmed that the Parsons Quality Management Plan was acceptable in a letter dated 15 April 2003.
- Participated in multiple teleconferences with U.S. EPA Region 5 Quality Assurance Team and Project Officer to resolve outstanding issues with the Quality Assurance Project Plan (QAPP). Provided a proposed revised Table to be included in the QAPP via e-mail to the U.S. EPA reviewer. We are awaiting approval of the proposed action levels prior to resubmitting revised pages for the QAPP for final review and approval.
- Confirmed that the lessee using the buildings on the site for storage of carpet and siding
 materials had removed all vehicles and other debris that had been stored outside of the
 buildings on the site without the authorization of the landowner under the lease
 agreement. During a visual inspection on 30 April 2003, the site appeared free of such
 obstacles to access for field sampling activities.

SUMMARY OF ALL VALIDATED RESULTS OF SAMPLING AND TESTS AND ALL OTHER DATA RECEIVED OR GENERATED IN REPORTING PERIOD

- No sampling or testing was conducted during reporting period.
- No data was generated or received during reporting period.

WORK PLANS AND OTHER DELIVERABLES REQUIRED, COMPLETED, AND SUBMITTED IN REPORTING PERIOD

- Monthly Progress Report as required by AOC ¶ 82.
- Revised per U.S. EPA comments and submitted the Field Sampling Plan, Revision I, and the RI/FS Work Plan, Revision I, on 3 April 2003 for delivery on 4 April 2003.
- Revised per U.S. EPA comments and submitted one corrected page to be inserted in Parsons Quality Management Plan, Revision 2. On 15 April 2003, U.S. EPA acknowledged in a letter to the CRS Site Group Chairperson that "The submitted QMP describes the quality system, which is acceptable and in compliance with U.S. EPA requirements."

WORK PLANNED FOR THE NEXT TWO MONTHS AND SCHEDULES

- Revised pages to Revision II of the QAPP will be submitted to agree with the changes made to the RI/FS Work Plan and Field Sampling Plan and revised Tables in the format referenced in Region 5 Instructions on the Preparation of a Superfund Division Quality Assurance Project Plan (June 2000).
- Submit Monthly Progress Reports in accordance with AOC ¶ 82.
- Upon approval of the Work Plan, Field Sampling Plan, and QAPP, will begin making arrangements to proceed with field activities.

PERCENTAGE OF WORK COMPLETE, DELAYS ENCOUNTERED OR ANTICIPATED, DESCRIPTION OF EFFORTS MADE TO MITIGATE THOSE DELAYS

• U.S. EPA review of the RI/FS Work Plan documents and the contractor qualifications has taken longer than anticipated in our Work Plan schedule. To mitigate these delays, we responded diligently and completely to the deficiencies identified during U.S. EPA's review by timely submitting revised documents.

WORK PLAN OR SCHEDULE MODIFICATIONS

• The estimated date for completing review of the RI/FS Work Plan and related documents on the schedule submitted with the Work Plan (October 11, 2002) needs to be adjusted when the review is completed. Some of the subsequent milestones may also need to be changed. We will revise the schedule accordingly when we submit the final signed version of the RI/FS Work Plan.

COMMUNITY RELATIONS SUPPORT

• No support requested by U.S. EPA during the previous month.